

**Petitioner:** Libertarian Party of Idaho State Central Committee

**Affected Parties:** Robert and Jennifer Imhoff-Dousharm

**Ruling Requested:** That Mr. and Mrs. Imhoff-Dousharm be expelled from the Libertarian Party of Idaho

**Basis:** LPID Bylaws Article VIII Section 5 - Judicial Committee states, in part:

The Judicial Committee may be tasked by the State Central Committee or the Executive Board with examining, reviewing, taking testimony, holding hearings, and resolving or making recommendations for the following:

...

E. Expulsion of a member;

The State Central Committee has moved to task the Judicial Committee with considering the expulsion of Mr. and Mrs. Imhoff-Dousharm pursuant to this section.

**Supporting Evidence:**

1. Jennifer Imhoff-Dousharm has been wrongly claiming that she is the Chair of the Libertarian Party of Idaho, signing her name on documents, and acting in that capacity to invalidly call and chair meetings of an invalid LPID Executive Board. (*Exhibit C*) While she might claim to be the Chair, she has not been the Chair since April 2nd, and the State Central Committee recognized that fact, and forbade her from continuing to act under the title of Chair.
2. Robert Imhoff-Dousharm, since he took office as the Chair of the LPID after the April 2nd convention this year, has been unresponsive to the needs of the party. This includes failing to respond to emails from the Judicial Committee, Regional representatives, candidates, and board members, in anything approaching a timely fashion; forming committees, but not giving any necessary information to the members of those committees; and delays in providing direct access to the accounting system or bank logins the Treasurer, Mr. Belnap, needed in order to file legally required reports. He also did not file information with the Secretary of State about the newly elected board at any point between April 2nd and May 31st.
3. On top of Mr. Imhoff's dereliction of duty, he also attempted to override the will of the delegation from Idaho to the National Convention at the end of May, by refusing to recognize a properly called meeting of the delegates as valid, after he missed the meeting that was called with 3 days' notice, which 7 of the 9 delegates attended, and an 8th acknowledged and explicitly declined to attend. At National, he represented himself as Chair of the Delegation to the Credentials Chair and the Chair of the Convention, including signing a document to check out a set of voting cards on behalf of the Idaho Delegation. When instructed by the Chair of the Convention to hold a meeting of the Idaho Delegation on the floor immediately, he ignored that instruction, and refused to acknowledge a meeting that was held around him. After that meeting, he then left the floor of the convention for the rest of the weekend, except for checking in as a delegate with the delegation Chair at the open of business on Saturday.

4. Following the Libertarian National Convention over Memorial Day Weekend of 2022, Mr. Imhoff removed access to the party email server from Chris Ward, Adam Belnap, and Zach Callear (*Exhibit A*). The party's publication, the Liberty Monitor, then posted a message saying that, because no State Central Committee existed to call the April 2022 LP Idaho Convention, that Convention is illegitimate, and that therefore the previous board needed to be reinstated (*Exhibit B*). This action is an obvious violation of his duties as Chair, as well as absurd, because there has never been an LP State Central Committee before this one, so by the logic of his action, no Executive Board has ever been legitimate. This also contradicts the motion made at the end of the April Convention, which passed unanimously, without objection from Mr. or Mrs. Imhoff, that all delegates present would recognize the results of the convention, despite concerns about its scheduling.
  
5. After the actions of Mr. Imhoff to disenfranchise the delegates to the April 2022 convention by claiming it was null and void, Mrs. Imhoff took up the role of Chair illegitimately (*Exhibit E*). She has held multiple meetings of the false board, signed her name as chair to emails and newsletters being sent to the LPID mailing lists, and signed her name as chair on a document submitted to the Secretary of State (*Exhibit C*), which falsely claimed that the elections of the new officers at the April 2022 convention were void. She has also solicited members of the party to participate in an illegitimate process to try to pack the State Central Committee (*Exhibit D*).

## Exhibit A - Screenshots Showing Deleted Email Accounts

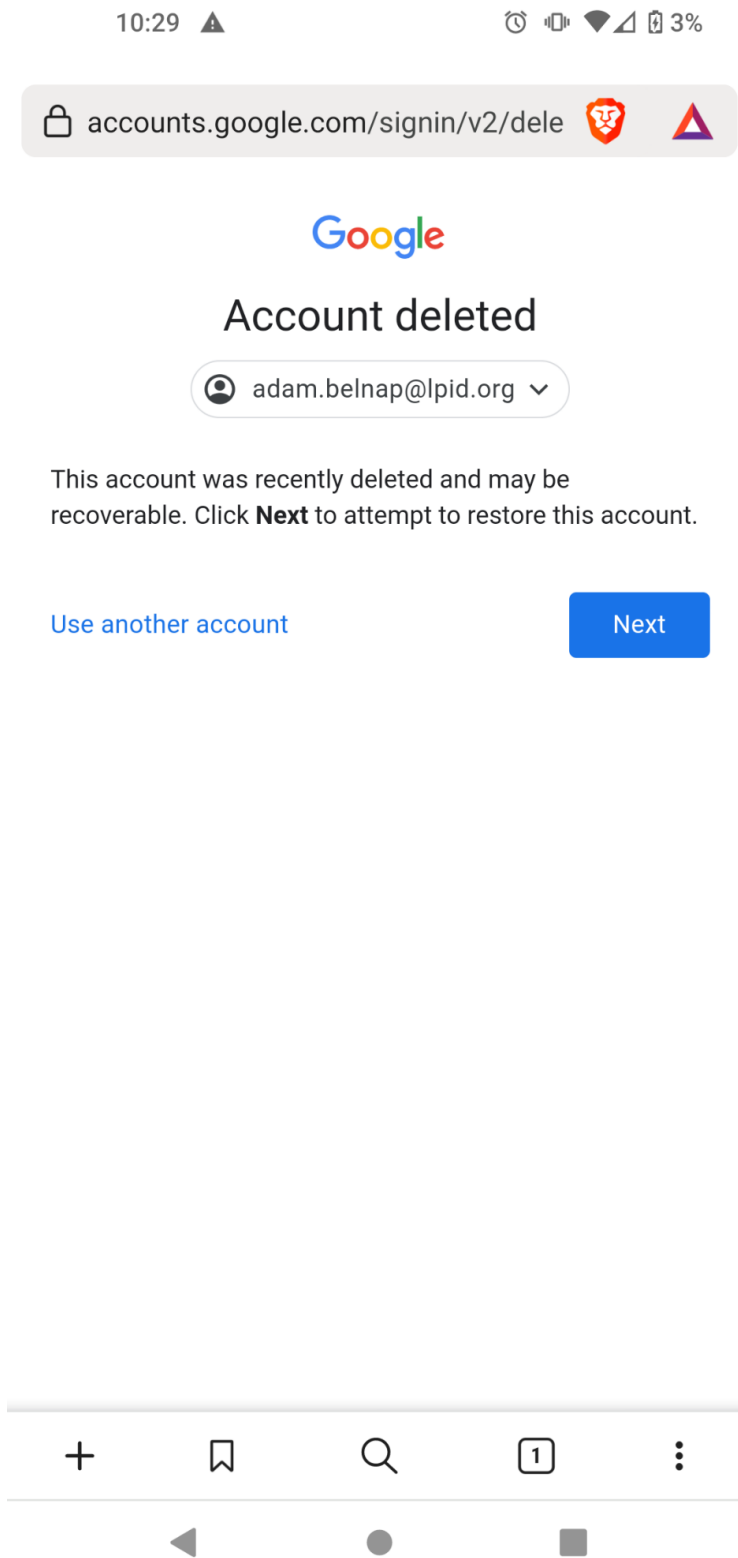


EXHIBIT A - Continued



## Account deleted

 chris.ward@lpid.org ▾

This account was recently deleted and may be recoverable.  
Click **Next** to attempt to restore this account.

[Use another account](#)

Next

## Exhibit A - Continued


10:13

🕒 🔊 📶 🔋 5%

🔒 accounts.google.com/signin/v2/dele  



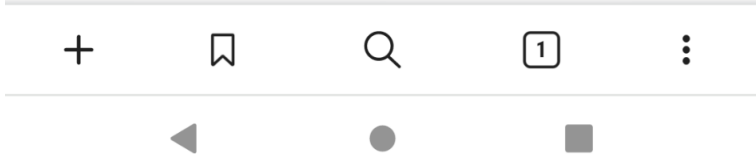
### Account deleted

 zach.callear@lpid.org ▾

This account was recently deleted and may be recoverable. Click **Next** to attempt to restore this account.

[Use another account](#)

Next



**Exhibit B - Email from the Libertarian Party of Idaho (5/31/22)**

Delivered-To: [REDACTED]

Received: by [REDACTED] with SMTP id [REDACTED];

Tue, 31 May 2022 18:07:39 -0700 (PDT)

X-Google-Smtp-Source:

ABdhPJzIF8o9ZzTs1ukv8/m+k12x654kJQyxCFM0oQGNyLEldt+xLP4g9AW6B0CS34ZMxJcqB  
PYs

X-Received: by [REDACTED] with SMTP id [REDACTED];

Tue, 31 May 2022 18:07:39 -0700 (PDT)

Received: by [REDACTED] with SMTP id [REDACTED]

2022-06-01 01:07:37.715219652 +0000 UTC m=+4764131.275807166

Received: from nationbuilder.com (unknown) by geopod-ismtpd-3-2 (SG) with ESMTP id  
5pTTInvVRk-f-PKeJ71Drw for <sendingthrough@nationbuilder.com>; Wed, 01 Jun 2022  
01:07:37.598 +0000 (UTC)

Date: Wed, 01 Jun 2022 01:07:37 +0000 (UTC)

From: Libertarian Party Newsletter <newsletter@lpid.org>

Message-ID: <6296bbd991a1a\_7cab12f6f60413d3@asgworker-qmb3-  
23.nbuild.prd.useast1.3dna.io.mail>

Subject: 2022 Idaho Compliance Notification - State Executive Board

Mime-Version: 1.0

Content-Type: multipart/alternative; boundary="--

==\_mimepart\_6296bbd98d27d\_7cab12f6f60412f2"; charset=UTF-8

Content-Transfer-Encoding: 7bit

List-Unsubscribe: <<http://www.lpid.org/unsubscribe>>

-----=\_mimepart\_6296bbd98d27d\_7cab12f6f60412f2

Content-Type: text/plain; charset=iso-8859-1

Content-Transfer-Encoding: quoted-printable

On April 2nd, 2022, the Libertarian Party of Idaho held an annual convention. A new Executive Board was formed during this meeting. During a Regular Meeting of that board, the meeting minutes were reviewed for accuracy. It was noted that Idaho Law 34-707 was not correctly followed by the calling of the April 2nd meeting, as State Central Committee members did not get proper notice and organize in line with Idaho Law 34-502.

To rectify this issue, the Libertarian Party of Idaho will revert to the prior Executive Board holding elected office. This action was taken under Idaho State law, and not Party bylaws or governing parliamentary procedures. This board will hold office until such time as the State Central Committee can call the appropriate convention for the party, in compliance with Idaho Law.

The Secretary of State has accepted a formal notice from the Party which recognized our party has made this adjustment to come in compliance with Idaho Law, and has a formally filed this document at the state house in our party records.

**Exhibit B - Continued**

For your reference, here is the correct listing of the Libertarian Party of Idaho Executive Board Members:

Chair - Jennifer Imhoff-Dousharm  
chair@lpid.org <mailto:chair@lpid.org>

Vice Chair - Aaron Mason  
vice.chair@lpid.org <mailto:vice.chair@lpid.org>

Acting Treasurer - Robert Imhoff-Dousharm  
treasurer@lpid.org <mailto:treasurer@lpid.org>

Secretary - Dan Karlan  
secretary@lpid.org <mailto:secretary@lpid.org>

Region 1 - Jennifer Luoma  
region1rep@lpid.org <mailto:region1rep@lpid.org>

Region 2 - Joe Evans  
region2rep@lpid.org <mailto:region2rep@lpid.org>

Region 3 - Beth Clark  
region3rep@lpid.org <mailto:region3rep@lpid.org>

Regards,

Jennifer Imhoff-Dousharm  
Chair, Libertarian Party of Idaho  
<<http://www.lpid.org/>><http://www.lpid.org/>

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Libertarian Party of Idaho - PO Box 2291, Eagle, ID 83616, United States

This email was sent to [REDACTED]. LPID appreciates your support and respects your privacy. View our privacy policy or To stop receiving emails: <https://www.lpid.org/unsubscribe>

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Created with NationBuilder - <http://nationbuilder.com/>



**Exhibit C - [insert name here]**

Attachment: Received 6/7/22 at 5:13 PM MDT



**LIBERTARIAN**

**PARTY OF IDAHO**

MAY 31 '22 AM8:06  
IDAHO SECRETARY OF STATE

## Notice of Executive Board Membership

**Date:** May 30th, 2022

TO: Idaho Secretary of State  
FROM: Executive Board, Libertarian Party of Idaho  
RE: Notice of reversion to original Executive Board

On April 2nd, 2022, the Libertarian Party of Idaho held an annual convention. A new Executive Board was formed during this meeting. During a Regular Meeting of that board, the meeting minutes were reviewed for accuracy. It was noted that Idaho Law 34-707 was not correctly followed with the calling of the April 2nd meeting, as State Central Committee members did not properly organize and call that meeting.

To rectify this issue, the Libertarian Party of Idaho will revert to the original Executive Board holding elected office, until such time as the State Central Committee can call the appropriate convention for the party.

The Libertarian Party of Idaho will thus not submit any meeting minutes to the Secretary of State informing of any role changes to the officers of the party until such time as a convention has been completed and meeting minutes have been approved by the Executive Board.

The Libertarian Party of Idaho requests the assistance of the office of the Secretary of State to assign the role of Treasurer back to the original Treasurer of record prior to April 2nd, 2022.

Jennifer Imhoff

Chair

05 / 30 / 2022

Robert Imhoff

Acting Treasurer

05 / 30 / 2022

Jennifer Luoma

Member

05 / 30 / 2022

Joe Evans

Region 2 chair

05 / 30 / 2022

Beth Clark

Region 3 Chair

05 / 30 / 2022



**Exhibit C - Continued**  
Attachment - Continued



Audit Trail

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TITLE	Libertarian Party of Idaho - Letter to Secretary
FILE NAME	2022 Secretary of State Letter.pdf
DOCUMENT ID	83ad8c33d63f89e2a49bed8c30f0c17568b7a46a
AUDIT TRAIL DATE FORMAT	MM / DD / YYYY
STATUS	✦ Signed

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Document History

 SENT	<b>05 / 31 / 2022</b> 03:50:50 UTC	Sent for signature to Jennifer Imhoff (jennifer.imhoff@lpid.org), Beth Clark (beth.clark@lpid.org), Robert Imhoff (robert.imhoff@lpid.org), Joe Evans (joerevans@hotmail.com) and Jennifer Luoma (jen@shons.com) from john.galt@lpid.org IP: 172.58.44.62
 VIEWED	<b>05 / 31 / 2022</b> 03:51:03 UTC	Viewed by Robert Imhoff (robert.imhoff@lpid.org) IP: 172.58.44.62
 SIGNED	<b>05 / 31 / 2022</b> 03:51:26 UTC	Signed by Robert Imhoff (robert.imhoff@lpid.org) IP: 172.58.44.62
 VIEWED	<b>05 / 31 / 2022</b> 03:51:40 UTC	Viewed by Jennifer Imhoff (jennifer.imhoff@lpid.org) IP: 172.58.44.62
 SIGNED	<b>05 / 31 / 2022</b> 03:52:03 UTC	Signed by Jennifer Imhoff (jennifer.imhoff@lpid.org) IP: 172.58.44.62

**Exhibit C - Continued**  
Attachment - Continued





Audit Trail

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<b>TITLE</b>	Libertarian Party of Idaho - Letter to Secretary
<b>FILE NAME</b>	2022 Secretary of State Letter.pdf
<b>DOCUMENT ID</b>	83ad8c33d63f89e2a49bed8c30f0c17568b7a46a
<b>AUDIT TRAIL DATE FORMAT</b>	MM / DD / YYYY
<b>STATUS</b>	◆ Signed

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Document History

 VIEWED	<b>05 / 31 / 2022</b> 03:52:52 UTC	Viewed by Joe Evans (joerevans@hotmail.com) IP: 172.58.43.186
 SIGNED	<b>05 / 31 / 2022</b> 03:54:04 UTC	Signed by Joe Evans (joerevans@hotmail.com) IP: 172.58.43.186
 VIEWED	<b>05 / 31 / 2022</b> 03:54:20 UTC	Viewed by Jennifer Luoma (jen@shons.com) IP: 98.145.140.58
 SIGNED	<b>05 / 31 / 2022</b> 03:59:33 UTC	Signed by Jennifer Luoma (jen@shons.com) IP: 98.145.140.58
 VIEWED	<b>05 / 31 / 2022</b> 04:17:50 UTC	Viewed by Beth Clark (beth.clark@lpid.org) IP: 174.27.161.119
 SIGNED	<b>05 / 31 / 2022</b> 04:18:55 UTC	Signed by Beth Clark (beth.clark@lpid.org) IP: 174.27.161.119
 COMPLETED	<b>05 / 31 / 2022</b> 04:18:55 UTC	The document has been completed.

## Exhibit D - Second Email

Delivered-To: [REDACTED]

Received: by [REDACTED] with SMTP id [REDACTED];

Sun, 5 Jun 2022 23:00:53 -0700 (PDT)

X-Google-Smtp-Source:

ABdhPJzcZde4dwvqclDcCglHqm2ShokfpzQaYjQNIzDuoYmGs33HEOrb3k6FCczXzq/ye73/Y7  
o

X-Received: by [REDACTED] with SMTP id [REDACTED];

Sun, 05 Jun 2022 23:00:53 -0700 (PDT)

Received: by [REDACTED] with SMTP id [REDACTED]

2022-06-06 06:00:52.306859244 +0000 UTC m=+363680.530888902

Received: from nationbuilder.com (unknown) by geopod-ismtpd-5-5 (SG) with ESMTP id  
HfhNQtZaQ7KaDviZ2hhwHw for <sendingthrough@nationbuilder.com>; Mon, 06 Jun 2022  
06:00:52.247 +0000 (UTC)

Date: Mon, 06 Jun 2022 06:00:52 +0000 (UTC)

From: Libertarian Party Membership <membership@lpid.org>

Message-ID: <629d98142ee43\_24dcbacf5c868ae@asgworker-qmb3-  
24.nbuild.prd.useast1.3dna.io.mail>

Subject: Volunteers Needed!

Mime-Version: 1.0

Content-Type: multipart/alternative; boundary="--

==\_mimepart\_629d98141029e\_24dcbacf5c867f9"; charset=UTF-8

Content-Transfer-Encoding: 7bit

List-Unsubscribe: <<http://www.lpid.org/unsubscribe>>

-----=\_mimepart\_629d98141029e\_24dcbacf5c867f9

Content-Type: text/plain; charset=iso-8859-1

Content-Transfer-Encoding: quoted-printable

[REDACTED] --

The Libertarian Party of Idaho is in the process of building a state central committee in order to call a proper convention. If you are interested in being appointed as a precinct man and qualify, per state law, please contact us by the end of day FRIDAY 6/10.

Idaho state law requires precinct committeemen to meet the following criteria:

34-624 (2): No person shall be elected to the office of precinct committeeman unless he has attained the age of eighteen (18) years at the time of his election, is a citizen of the United States, and is a registered elector of the voting precinct for a period of six (6) months next preceding his election.

If you are interested in the role, or would like more information please co=

ntact any member of the board:

Chair, Jennifer Imhoff [chair@lpid.org](mailto:chair@lpid.org) <<mailto:chair@lpid.org>>

Vice Chair, Aron Mason [vice.chair@lpid.org](mailto:vice.chair@lpid.org) <<mailto:vice.chair@lpid.org>>

Secretary, Dan Karlan [secretary@lpid.org](mailto:secretary@lpid.org) <<mailto:secretary@lpid.org>>

Region 1 Representative, Jennifer Louma [reg1@lpid.org](mailto:reg1@lpid.org) <<mailto:reg1@lpid.org>>

Region 2 Representative, Joe Evans [reg2@lpid.org](mailto:reg2@lpid.org) <<mailto:reg1@lpid.org>>

Region 3 Representative, Beth Clark [reg3@lpid.org](mailto:reg3@lpid.org) <<mailto:reg1@lpid.org>>

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Libertarian Party of Idaho - PO Box 2291, Eagle, ID 83616, United States

This email was sent to [REDACTED]. To stop receiving emails:

<https://www.lpid.org/unsubscribe>

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**Exhibit E - Legal Memorandum "Validity of the Libertarian Party of Idaho 2022 State Convention"**

See attached.